

**UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF NEW YORK**

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THE CITY OF ROCHESTER

Plaintiff,

-against-

SMITH & WESSON BRANDS, INC.;

BERETTA U.S.A. CORP.;

BUSHMASTER FIREARMS

INDUSTRIES, INC.; COLT'S

MANUFACTURING COMPANY, LLC;

GLOCK, INC.; HI POINT FIREARMS,

A/K/A STRASSEL'S MACHINE, INC.;

JA INDUSTRIES, LLC, F/K/A JENNINGS

FIREARMS, F/K/A BRYCO ARMS,

F/K/A JIMENEZ ARMS; KEL-TEC CNC

INDUSTRIES, INC.; O.F. MOSSBERG &

SONS, INCORPORATED; REMARMS,

LLC, A/K/A REMINGTON FIREARMS;

SAVAGE ARMS, INC.; SIG SAUER,

INC.; SPRINGFIELD ARMORY, INC.;

STURM, RUGER & CO., INC.; SCCY

INDUSTRIES, LLC; TAURUS

HOLDINGS, INC., A/K/A TAURUS

INTERNATIONAL MANUFACTURING,

INC.; JJE CAPITAL HOLDINGS, LLC;

ARM OR ALLY, LLC; BROWNELLS,

INC., A/K/A BROWNELLS OR BOB

BROWNELL'S; GS PERFORMANCE,

LLC, A/K/A GLOCKSTORE, A/K/A

GSPC A/K/A DOUBLE DIAMOND;

INDIE GUNS, LLC; JSD SUPPLY; KM

TACTICAL; POLYMER80, INC.;

PRIMARY ARMS, LLC; RANIER ARMS,

LLC; SALVO TECHNOLOGIES, INC.,

A/K/A 80P BUILDER OR 80P FREEDOM

CO.; ROCK SLIDE USA, LLC;

BANGERS, L.P. N/K/A IRON

VALLEY™ SUPPLY CO.; GUN CENTER

INC., A/K/A GC WHOLESALE; RSR

GROUP, INC.; VINTAGE FIREARMS,

LLC; AND WOLCOTT GUNS INC.,

Defendants.

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Case No. 6:23-cv-06061

**NOTICE OF MOTION AND MOTION  
TO APPEAR *PRO HAC VICE* OF  
BRIAN W. BARNES**

Nature of Action: Other Statutory Actions

Moving Parties: Defendants, Brownells, Inc., a/k/a Brownells or Bob Brownell's, Primary Arms, LLC, Salvo Technologies, Inc., a/k/a 80P Builder or 80P Freedom Co. and Rock Slide USA, LLC

Motion: Admission *Pro Hac Vice* of Brian W. Barnes, Esq.

Date and Time: At a time to be determined before the Hon. Frank P. Geraci, Jr. (or upon submission)

Place: United States District Courthouse  
100 State Street  
Rochester, New York 14614

Supporting Papers: 1. Notice of Motion for Admission Pro Hac Vice;  
2. Sponsor Affidavit of Terrance P. Flynn, Esq.;  
3. Petition for Attorney Admission of Brian W. Barnes, Esq.;  
4. Attorney's Oath;  
5. Civility Principles Form; and  
6. Attorney's Database and ECF Registration Form.

Answering Papers: Pursuant to Local Rule 7(b), unless the Court issues an order otherwise.

Reply Papers: None.

Relief Requested: Pursuant to Local Rule 83.1(c), defendants seek an order granting their motion *pro hac vice* seeking the admission of Brian W. Barnes to participate in the above-captioned matter, and for such other and further relief as the Court deems just and proper.

Grounds for Relief: Local Rule 83.1(c)

Oral Argument: Not Requested.

Dated: Buffalo, New York  
February 15, 2023

Respectfully Submitted,

/s/ Terrance P. Flynn  
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Terrance P. Flynn, Esq.  
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*Attorneys for Defendants,  
Brownells, Inc., a/k/a Brownells or Bob Brownell's,  
Primary Arms, LLC, Salvo Technologies, Inc., a/k/a  
80P Builder or 80P Freedom Co., and Rock Slide  
USA, LLC*